

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

**IN RE:** : **CHAPTER 13**

**VIVIAN BYERS** :  
**DEBTOR (S)** : **BANKRUPTCY NO. 15-18202ELF**

**WILLIAM C. MILLER** :  
**STANDING TRUSTEE** :

**PLAINTIFF** :

**VS.** :

**SELECT PORTFOLIO** :  
**DEFENDANT(S)** : **ADVERSARY NO.**

**COMPLAINT FOR TURNOVER OF PROPERTY**

William C. Miller, Chapter 13 standing trustee avers the following in support of this complaint for Turnover of Property:

1. He is the duly qualified and so acting standing trustee in the above-captioned matter.
2. Defendant, Select Portfolio, is an organization with an office at 3217 S. Deckerland Drive, Salt Lake City, UT 84119, which has filed a proof of claim in the bankruptcy case underlying this adversary proceeding.
3. The Court has jurisdiction over this adversary proceeding pursuant to 28 U.S.C. Section 1471.
4. A copy of the standing trustee disbursement report shows an overpayment to SelectPortfolio, PO Box 65250, Salt Lake City, UT 84165, and is attached hereto as Exhibit "A".

5. The standing trustee has demanded that the defendant(s) turnover to the trustee \$380.00 as described herein by letters dated November 18, 2016, February 7, 2017 and July 25, 2018, attached collectively as Exhibit "B". Also attached is the Court's claims docket, attached hereto as Exhibit "C. and the Proof of Claim attached hereto as Exhibit D.

**WHEREFORE**, the standing trustee prays that the defendant(s) be ordered to surrender and deliver possession of the property of the estate described herein, together with the costs of suit incurred herein, and for such other and further relief as is just.

\_\_\_\_\_/s/\_\_\_\_\_  
**WILLIAM C. MILLER**  
**CHAPTER 13 STANDING TRUSTEE**